UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ORIGINAL
WVFRP005

SUBJECT: **SPCC PRE-INSPECTION INFORMATION CRITERIA**

FROM: **target/contact:** Eduardo Rovira

TO: **Regina A. Starkey, SPCC Coordinator (3HS32)**

Tentative Inspection Date: November 15, 1999

The following information pertains to the target facility in preparation to conduct an SPCC inspection and/or review the SPCC Plan:

TARGET FACILITY LOCATION: **FRP #** WV-FRP-005
NAME Etowah Terminal
ADDRESS 1015 Barlow Dr.
CITY Charleston COUNTY Kanawha STATE WV ZIP 25311

OWNER/OPERATOR INFORMATION:
NAME Pennzoil Company
ADDRESS _____
CITY _____ COUNTY _____ STATE ___ ZIP _____

INITIAL TARGET SPECIFICATIONS:
OSC EMER RESP___ OSC Field Observation___ OSC Geographical___ Spill History___
Federal/State Request___ FRP Facility ✓ Geographic/Multi-Media Enforce Initiative___
TAT Conflict of Interest Yes ____ or No ____

TARGET BACKGROUND INVESTIGATION (contacts):
incident notification reports _____ (RRC) prior SPCC inspections _____ (SPCC Coord)
prior 311 violations _____ (Oil Enf Coord) chemical safety audit _____ (3HW33)
miscellaneous contacts as applicable: NPDES___ UIC___ RCRA___ UST/LUST___ OCI___
ORC___ FED FAC COORD___ STATE___ USCG___ OTHER___

COMMENTS: _____

I acknowledge receipt of Pre-inspection information and assign case number as follows:

SPCC Case Number WV-00-001 Regina A. Starkey 11/5/99
Regina A. Starkey,
SPCC Coordinator

[pre-insp stardisc2/01-26-98]

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1650 Arch Street
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ACKNOWLEDGEMENT AND RECORD OF SPCC/FRP INSPECTION

SPCC CASE NUMBER: WV-00-001 FRP REGIONAL ID#: WV-FRP-005 DATE: 11/15/99

TO: Regina A. Starkey, SPCC Coordinator (3HS32)
CC: Linda J. Ziegler, FRP Coordinator (3HS32) (only if FRP applicable)

Inspector's Printed Name/Signature: Rovira Eduardo Eduardo Rovira

Inspection Team Members: Rovira / Wilson

Name/Location of Facility: Pennzoil - Quaker State

Address: 1015 Barlow Dr.

City: Charleston County: Kanawha State: WV Zip: 25311

Facility Contact/Title: John L. Hutchinson / Terminal Manager

Telephone Number: (304) 342-8161

Name of Owner/Operator: Pennzoil Products Company

Address: P.O. Box 2967

City: Houston State: TX Zip: 77252

Telephone Number: (713) 546-4209

** See pages 10 to 11 for FRP only information

Synopsis of business operations: Bulk Oil Storage / Petroleum Distribution Terminal

Route of entry and estimated distance to waterway: On the ELK river (less than 1/4 mi)

Acknowledgement:

I acknowledge that an SPCC/FRP inspection of this facility was conducted on the 15th day of November, 19 99.

Facility Representative Printed Name/Signature: John R Hutchinson

NOTE: During this inspection the owner/operator of the facility was asked to provide an extra copy of the SPCC Plan, which will be submitted with this report to the SPCC Coordinator. An extra copy of the SPCC Plan was provided to the inspector (Y/N). If no, the owner/operator of the facility has been asked to send a copy of the SPCC Plan, if available, via certified mail, return receipt requested, within 14 days of the date of this inspection to the SPCC Coordinator (mail code 3HS32) at the address on this letterhead (Y/N).

[Original of this page to SPCC coordinator, copy to facility representative]

(9/98)

Type of Facility (check all applicable descriptions):

☑ onshore	☑ commercial
☐ offshore	☐ agricultural
☐ oil well drilling	☐ public
☐ oil production	☐ waste treatment
☐ oil refining	☑ loading racks
☑ oil storage	☐ vehicles/rail cars (in-facility)
☐ industrial	☐ pipelines (in-facility)
☐ transformers/oil-filled equipt	☑ oil drum storage areas

Date of facility start operations: 1930's

Date facility first required plan: 1974

Oil storage capacity aboveground: 6 millions gallons

Oil storage capacity underground: N/A gallons

SPCC Plan prepared: Yes ** FRP Plan Prepared: Yes

SPCC Plan available for review: Yes ** FRP Plan Available: Yes

Facility normally attended at least 8 hours: 24/7 7-3

SPCC Plan Certified (seal affixed): Yes

Date Certified: 6/26/95

Name of Engineer: William L. Buckingham

License Number: 10417 State: WV

SPCC Plan reviewed every three years: _____

Record of SPCC Plan review available: _____

Date(s) of Review(s): _____

Spill of more than 1000 gallons in past 12 months: No

If yes, date of spill: _____ Was Plan submitted per 40 CFR 112.4: _____

Two spills of harmful quantity in past 12 months: No

If yes, dates of spills: _____ Was Plan submitted per 40 CFR 112.4: _____

Has there been a change in facility design, construction, operation, maintenance which could affect the facility's potential for discharge? If so, describe: _____

Date of Latest Change: Date Plan Amended:

The following information directly reflects the requirements of 40 CFR 112 as applicable to the facility inspected.

Facility Drainage, Onshore (excluding production facilities) [40CFR112.7(e)1]:

a.	from diked storage areas via valves:	(i)	Y
	valves manually operated:	(ii)	Y
b.	from diked storage areas via pumps or ejectors:	(i)	Y
	pumps or ejectors manually operated:	(ii)	Y
c.	storm water inspected prior to discharge: goes to an o/w	(ii)	
d.	from undiked areas into catchment basins:	(iii)	
e.	if dikes or catchment basins are not utilized, is there a diversion system to return spills to the facility:	(iv)	
f.	is drainage water treated at the facility:	(v)	Y

Inspector's comments on Facility Drainage, Onshore (excluding production facilities), based upon inspection:

Bulk Storage Tanks, Onshore (excluding production facilities) [40CFR112.7(e)2]:

a.	Material and construction of tanks compatible to the oil stored and the conditions of storage:	(i)	Y
b.	All Tank installations have secondary containment:	(ii)	Y
c.	Secondary containment appears to be adequate:	(ii)	Y
d.	Diked areas are sufficiently impervious:	(ii)	Y
e.	Drainage from diked areas to on-site treatment:	(iii)	
	If no, is the bypass valve normally sealed closed:	(iii)(A)	
	Drainage from diked area is inspected: goes to an o/w	(iii)(B)	
	Bypass valve is opened and resealed properly:	(iii)(C)	
	Adequate records of dike drainage are maintained:	(iii)(D)	
f.	Underground tanks at this facility:	(iv)	N
	Protected from corrosion:	(iv)	↓
	Pressure tested periodically:	(iv)	↓
g.	Partially buried tanks at this facility:	(v)	N
	Buried sections protected from corrosion:	(v)	↓

h.	Aboveground tanks at this facility:	(vi)	Y
	Subject to periodic integrity testing:	(vi)	Y
	Records of inspections maintained:	40CFR112.7(e)8	Y
	Internal heating coils utilized:	(vii)	N
	If yes, steam return/exhaust monitored:	(vii)	N
	External heating system utilized:	(vii)	N
	Tanks are "fail-safe" engineered:	(viii)	Y
	Audible high liquid level alarm:	(viii)(A)	Y
	Visual high liquid level alarm:	(viii)(A)	Y
	Automatic high liquid level pump cutoff:	(viii)(B)	Y
	Communications between gauger and pumping station:	(viii)(C)	Y
	System of determining liquid level in tanks such as sensing devises:	(viii)(D)	Y
	Direct vision gauges:	(viii)(D)	Y
	Sensing devises and/or gauges regularly tested:	(viii)(E)	Y
i.	Effluents discharges directly to navigable waters observed frequently to detect oil spills:	(ix)	Y
j.	Causes of oil leaks resulting in accumulations of oil in diked areas are promptly corrected:	(x)	Y
k.	Mobile or portable tanks at this facility:	(xi)	N
	If yes, are positioned properly:	(xi)	↓
	A secondary means of containment is utilized:	(xi)	↓

Inspector's comments on Bulk Storage Tanks, Onshore (excluding production facilities), based upon inspection:

Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities) [40CFR112.7(e)3]:

a.	Buried pipelines are corrosion protected:	(i)	Y
b.	Not-in-service pipelines are capped or blank-flanged, and marked as their origin:	(ii)	Y
c.	Pipe supports are designed to minimize abrasion and corrosion, and allow for expansion and contraction:	(iii)	Y
d.	Aboveground pipelines are inspected regularly:	(iv)	Y
e.	Periodic pressure testing is conducted:	(iv)	Y
f.	Vehicle traffic warned of aboveground pipelines:	(v)	Y

Inspector's comments on Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities), base upon inspection:

Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore [40CFR112.7(e)4]:

a.	Rack drainage flows to catchment basin:	(ii)	Y
	Or drainage flows to treatment system:	(ii)	Y
	Or secondary containment is used:	(ii)	Y
b.	Is a system used to prevent vehicular departure before complete disconnect from transfer lines: Scully system	(iii)	Y
	interlock warning lights:	(iii)	
	physical barrier system:	(iii)	
	warning signs:	(iii)	Y
c.	Vehicle inspection before departing facility:	(iv)	Y

Inspector's comments on Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore, based upon inspection

Oil production Facilities, Onshore [40CFR112.7(e)5]:

a.	Drainage from secondary containment systems at tank batteries and central treatment stations are closed and sealed at all times except when rainwater is being drained:	
b.	Prior to drainage, accumulated oil on the rainwater is picked up and returned to storage or disposed of:	
c.	Field drainage ditches, road ditches, and oil traps, sumps or skimmers are regularly inspected for oil:	
	Accumulated oil is removed:	
d.	Aboveground tanks at this facility:	
	Material and construction are compatible with the oil stored and the conditions of storage:	
	Secondary means of containment appears adequate:	
	Tank inspections are conducted periodically:	
	By a competent person:	
	Includes tank foundation and supports:	
	Tank battery installations fail-safe engineered:	
	Adequate tank capacity to prevent tank overfill:	
	Overflow equalizing lines between tanks:	
	Vacuum protection to prevent tank collapse:	
	High level alarms:	
e.	Facility transfer operations at this facility:	
	Aboveground valves/pipelines examined periodically:	
	Brine disposal facilities examined often:	
	Flowline maintenance program established:	
	Records of inspection maintained:	

Inspector's comments on Oil Production Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Onshore [40CFR112.7(e)6]:

a. Mobile drilling/workover equipment positioned to prevent spilled oil from entering waters: .....
b. Secondary containment utilized: .....
c. Blowout prevention (BOP) assembly utilized: ..... *
d. Well control system utilized: ..... *

NOTE:** **Casing and BOP installations should be in accordance with State regulatory agency requirements

Inspector's comments on Oil Drilling and Workover Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Offshore [40CFR112.7(e)7]:

a. Oil drainage collection equipment utilized: .....
Drains controlled/directed to central collection: .....
b. Sump system, if used, adequate sized: .....
Spare pump/equivalent method available: .....
c. Separators/treaters equipped with dump valves: .....
Measures in place should dump valve fail: .....
d. Atmospheric storage/surge tanks equipped with high level sensing devices: .....
e. Pressure tanks equipped with high and low pressure sensing devices: .....
f. Tanks are corrosion protected: .....
g. Written procedure for inspecting and testing pollution prevention equipment and systems prepared: .....
Written procedure maintained at the facility: .....
Written procedure included in SPCC Plan: .....
Inspections and tests conducted periodically: .....
h. Surface and subsurface well shut-in valves and devices are sufficiently described: .....
Detailed records for each well maintained: .....
i. Blowout prevention (BOP) assembly utilized in accordance with State regulatory agency requirements: .....
j. Well control measures provided in the event of emergency conditions: .....
k. Written instructions are prepared for contractors and subcontractors by the owner or operator: .....
Such instructions are maintained at the facility: .....
l. Manifolds are equipped with check valves: .....
m. Flowlines are equipped with high pressure sensing device and shutin valve at the wellhead: .....
If no, a pressure relief system is provided: .....
n. Pipelines are corrosion protected: .....
o. Sub-marine pipelines are stress protected: .....
Sub-marine pipelines are inspected periodically: .....
Inspections are documented and maintained: .....

Inspector's comments on Oil Drilling and Workover Facilities, Offshore, based upon inspection:

Inspection and Records [40CFR112.7(e)8]:

a. Inspections required by 40 CFR 112 are in accordance with written procedures developed for the facility: ..... Y

b. Written procedures and a record of inspections are signed by the appropriate supervisor or inspector: ..... Y

c. Written procedures and a record of inspections are made part of the SPCC Plan: ..... Y

d. Written procedures and a record of inspections are maintained for a period of 3 Years: Y

Inspector's comments on Inspections and Records, based upon inspection:

Security (excluding oil production facilities) [40CFR112.7(e)9]:

a. Facility is fully fenced: .....(i) Y

b. Entrance gates locked and/or guarded: .....(i) Y

c. Master flow and drain valves secured in closed position when in a non-operating or non-standby status: .....(ii) Y

d. Starter control on pumps locked in the "off" position or located at a site accessible only to authorized personnel when in a non-operating or non-standby status: .....(iii) Y

e. Loading/unloading connection of pipelines are capped or blank-flanged when not in service: .....(iv) Y

f. Facility lighting appears to be adequate to facilitate the discovery of spills during hours of darkness and to deter vandalism: .....(v) Y

Inspector's comments on Security (excluding oil production facilities), based upon inspection:

Personnel Training and Spill Prevention Procedures [40CFR112.7(e)10]:

a. Personnel properly instructed in spill prevention.....(i) Y

b. Designated person accountable for spill prevention: .....(ii) Y

c. Spill prevention briefings scheduled periodically: Y

Dates of Discharge Prevention Meetings: 3/19/98 3/22/99

Inspector's comments on Personnel Training and Spill Prevention Procedures, based upon inspection:

Aboveground Storage Tank and Appurtenances Inspection Checklist: [40CFR §112.7(e)]

1. Check Tanks for leaks, specifically looking for
   - a. Discolorations of tanks ..... 2(vi) ☐
   - b. Corrosion ..... 2(vi) ☐
   - c. Cracks ..... 2(vi) ☐
   - d. Drip marks and stains ..... 2(x) ☐
   - e. Puddles of stored material ..... 2(x) ☐
   - f. Localized dead vegetation ..... 2(x) ☐

2. Check Foundations for
   - a. Cracks ..... 2(vi) ☐
   - b. Settling ..... 2(vi) ☐
   - c. Gaps between tank and foundation ..... 2(vi) ☐
   - d. Discoloration ..... 2(vi) ☐
   - e. Puddles of stored material ..... 2(x) ☐

3. Check pipes and valves for
   - a. Presence of stored material on valves ..... 2(x) ☐
   - b. Evidence of leakage at joints and seams ..... 2(x) ☐
   - c. Localized dead vegetation ..... 2(x) ☐
   - d. Bowing of pipes between supports ..... 3(iii) ☐
   - e. Droplets of stored material ..... 3(iv) ☐
   - f. Discoloration ..... 3(iv) ☐
   - g. Corrosion ..... 3(iv) ☐

Inspector's comments on Aboveground Storage Tank and Appurtenances, based upon inspection:

Inspector's comments on Underground Storage Tank and Appurtenances, based upon inspection:

Secondary Containment Checklist: [40CFR §112.7(e)]

1. Secondary Containment (dike or berm system)
   - a. Drainage mechanism manually operated ..... 1(ii) ☐
   - b. Capacity appears adequate ..... 2(ii) ☐
   - c. Sufficiently impervious to stored materials ..... 2(ii) ☐
   - d. Standing water within dike or berm ..... 2(ii) ☐
   - e. Debris/vegetation within the dike or berm area ..... 2(ii) ☐
   - f. Erosion or corrosion of dike or berm ..... 2(ii) ☐
   - g. Presence of stored material within dike or berm ..... 2(x) ☐

2. Secondary Containment (other systems such as moat, catch-basin, pond, etc)
   - a. Capacity appears adequate ..... 2(ii) ☐
   - b. Drainage mechanism manually operated ..... 2(ii) ☐
   - c. Standing water within the secondary containment system ..... 2(ii) ☐
   - d. Debris/vegetation within the secondary containment system ..... 2(ii) ☐
   - e. Erosion or corrosion of the secondary containment system ..... 2(ii) ☐
   - f. Presence of stored material within secondary containment ..... 2(x) ☐

3. Secondary Containment (drainage systems)
   - a. Drainage adequate to return spilled material to facility ..... 2 ☐

4. Secondary Containment (none or inadequate) 40CFR §112.7(d)
   - a. Demonstration of impracticability ..... ☐
   - b. Contingency Plan developed per 40 CFR 109 ..... ☐
   - c. Written commitment ..... ☐

Inspector's comments on Secondary Containment, based upon inspection:

Check the appropriate box:

- ☐ THIS FACILITY IS NOT SUBJECT TO FRP REGULATIONS
- ☐ IS A COPY OF ATTACHMENT C-II FILLED OUT AND MAINTAINED WITH THE SPCC PLAN? IF NO PROVIDE A COPY AND REQUEST FILLED OUT FORM BE PROVIDED ALONG WITH THE SPCC PLAN.
- ☐ THIS FACILITY IS SUBJECT TO FRP REGULATIONS BUT HAS NOT PROVIDED A COPY TO EPA REGION III

**** (THIS SECTION APPLIES TO FRPS ONLY)**

The following 3 lines to be filled out before on-site inspection:

FRP Regional ID # _____ Reviewer Name _____ Date of FRP Plan Review Checklist _____

The following records will be checked:

Personnel Response Training

Name/Position Response Training/Date/No. of Hrs Prevention Training/Date/No. of Hrs

Note: If appropriate, a copy will be photocopied during the inspection and noted comments.

Drills

QI Notification Drill Dates (Quarterly): 3/18 4/5 8/3 10/7/99

Facility Deployment Drill Dates (Semi-Annual): 6/16 10/1/99

OSRO Deployment Drill Dates (Annual):

Tabletop Drill Dates (Annual): 10/7/97 6/2/98 10/1/99

Unnannounced Exercise Dates (Annual): 10/7/97 6/2/98 10/1/99

Response Equipment Inspection Dates (Monthly):

ATTACHMENT C-II (40 CFR Part 112 - FRP Final Rule p. 34105)

Certification of the Applicability of the Substantial Harm Criteria

Facility Name: _____

Facility Addresses: _____

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes ☐ No ☐

2 Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes ☐ No ☐

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such as that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

Yes ☐ No ☐

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?

Yes ☐ No ☐

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes ☐ No ☐

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____ Name (Please type or print): _____

Title: _____ Date: _____

[1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

RESPONSE EQUIPMENT INSPECTION LOG	
Equipment	Comments

Note: These two logs are available in full-page format (additional copies are available at the office). If additional forms are needed they should be attached at the end of the inspection form and so noted on this page.

PHOTO LOG			
Case #		Roll #	
Picture #	Description		

[shaded areas represent FRP/SPCC information, ** represents FRP information only] (9/98)

John L. Hutchinson

FACILITY RESPONSE PLAN
INTERVIEW CHECKLIST

FACILITY

Hours of Operations	☐ 8 hrs	☐ 10 hrs	☐ 12 hrs	☑ 24 hrs
Work Week	☐ weekend	☐ flex week	☐ 5-day	☑ 7-day

SCENARIO
Demonstrates knowledge of the plan:

☐ Plan	☑ EPA

DISCOVERY
Means of spill detection:

Facility Personnel	☐ none	☐ weekly	☑ daily	☐ hourly
Automatic	☐	☐ audio	☑ visual	
Manual	☐	☐ audio	☐ visual	
Offsite	☐	☐ residential	☐ commercial	

ASSESSMENT (QI Duties)
Exhibits knowledge of the following:

☑ amount	☐ distance (downgradient water)	☑ time
☑ directions	☐ material	☑ sensitive/vulnerable areas
☐ hazards imposed	☐ source	☐ cause (& chain reaction)
☐ topography (pathway)	☐ site conditions (soils impact)	☐ resources deployed (response & removal actions)
☐ climate conditions		

NOTIFICATIONS
(when, where, what, how much)

☑ Internal (company) (communication equip) ☑ External (agencies) ☑ Contractor

MITIGATION
Exhibits knowledge of the following:

Resources . . . . . ☑ personnel ☑ contractor

Mechanical . . . . . ☐ ☑ boom (size/amount) ☐ ☐ skimmers ☐ ☐ vacuum trucks

☐ ☐ tractors ☐ ☐ boats ☐ ☐ sorbents (type/year)

☐ hand tools ☐ equip checklist & test logs

☐ operational status ☐ fire fighting equip.

Chemical/Biological . . . . . ☐ ☐ knowledge of products ☐ ☐ nature of application

☐ ☐ knowledge of authorizations ☐ operational status

Burning/Other mitigating devices . . . . . .

☐ knowledge of products ☐ ☐ nature of application ☐ ☐ knowledge of authorizations

TEMPORARY STORAGE
Have plans for the following:

	drums	tanks	pits	n/a
☐ on site	☐	☐	☐	☐
☐ off site	☐	☐	☐	☐
☑ contractor	☐	☐	☐	☐
☐ regulatory requirements	☐	☐	☐	☐

TREATMENT
Exhibiting knowledge of the following:

☐ reclamation ☐ land farming

DISPOSAL
Exhibits knowledge of the following:

☐ disposal plans ☐ waste streams ☐ waste facilities ☐ regulatory requirements

ROLES AND RESPONSIBILITIES
Exhibiting knowledge of the following:

☑ Q.I. ☑ local ☑ state ☑ federal ☑ media

COMMAND & CONTROL (ICS & USC)
Familiarity with the following:

☑ logistics ☑ operations ☐ planning ☑ financial
☑ internal ☑ external ☑ contractor

COMMAND CENTER
Planning for or having knowledge of the following:

☐ accommodations ☑ communications

TRAINING
Exhibiting knowledge in the following:

☑ planning ☐ spill response ☐ safety ☑ prevention ☑ equipment

☑ training logs

EXERCISING
Has participated in or has knowledge of:

☑ PREP ☐ other (please specify)_____ ☐ approved by RA

☐ Schedule ☐ Activity ☑ drill/exercise logs

☐ Based on training & drills/exercises, is the facility able to implement plan?

EVACUATION
Exhibits knowledge of or participated in:

	audio	visual
☑ internal	☑	☑
☐ external	☐	☐

Take note of following:

☐ spill hazards	☐ check in area	☐ arrival routes of responders
☐ prevailing winds	☐ command center	☐ evacuation route (& alternate)
☐ alarm locations	☐ facility shelter	☐ community evacuation

GENERAL COMMENTS